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March 19<sup>th</sup>, 2019

Oregon Public Utility Commission  
Attn: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

**RE: ENERGY EFFICENCY AVOIDED COSTS FOR USE BY NONGOVERNMENTAL ENTITY – Docket AR 621**

Attention: Filing Center

Please find attached Cascade Natural Gas Corporation's comments regarding Docket AR 621 in relation to an email from the Commission dated February 22, 2019.

The Company appreciates the opportunity to file these comments and participate in workshops in this matter.

If there are any questions regarding this request, please contact me at (509) 734-4589 or via email at [mark.sellers-vaughn@cngc.com](mailto:mark.sellers-vaughn@cngc.com) or Brian Robertson at (509) 734-4546 or via email at [Brian.Robertson@cngc.com](mailto:Brian.Robertson@cngc.com).

Sincerely,  
CASCADENATURAL GAS CORPORATION

A handwritten signature in black ink that reads 'Mark Sellers-Vaughn'. The signature is written in a cursive, flowing style.

Mark Sellers-Vaughn  
Manager, Supply Resource Planning

*Comments of Cascade Natural Gas Corporation to the Oregon Public Utility Commission on Energy Efficiency Avoided Costs for Use by Nongovernmental Entity – Docket AR 621*

March 19, 2019

Cascade appreciates the opportunity to provide comments on the major issues discussed during the AR 621 rulemaking. Below, Cascade offers a correction to the NEED FOR RULE(S) section. Additionally, below is an outline of the three rules presented in notice filed on 2/21/2019, along with Cascade's response.

**NEED FOR THE RULE(S) – third paragraph:** Cascade is referred to as Cascade Natural Gas Company. The correct name is Cascade Natural Gas *Corporation*.

**RULE 860-030-0007:** The changes to this rule eliminate the requirement for a subject gas utility to file avoided-cost information within 30 days of the PUC's acknowledgement of its integrated resource plan and makes a housekeeping change of changing "least-cost" plan to "integrated resource" plan.

**Cascade Response:** The Company supports changing the name to integrated resource plans, from least-cost plans. Cascade requests clarification about the definition of weatherization in this context. Does weatherization refer to Energy Trust conservation measures, or other energy conservation efforts outside this organization, such as those operated by the Low Income Weatherization Assistance Program?

**RULE 860-030-0011:** This rule requires an energy utility subject to this rule to submit data necessary to calculate its energy efficiency avoided costs to the PUC on or before October 15 of each year on a report form provided by the PUC.

**Cascade Response:** Cascade believes the October 15 date was selected to fit within Energy Trust's process schedule. However, a different nongovernmental agency in this context might have a different timeline. Cascade suggests modifying the language to include something along the lines of "...on or before October 15 of each year, *subject to change [emphasis Cascade]*, on a report form provided by the PUC ...". The Company also requests clarification regarding the use of third-party nongovernmental entity here. Does this include groups beyond the Energy Trust such as low-income agencies? Additionally, since the OPUC may update the required data, format and methodology used to report values on avoided costs at any time given 60 days to implement, does this mean that the changes would be needed for the upcoming reporting period, or could LDCs, in theory, be unintentionally compelled to provide updates every 60 days

**RULE 860-030-0013:** This rule specifies that the third-party nongovernmental entity approved by the PUC to administer energy efficiency measures and programs on behalf of the regulated energy utilities may not use the energy efficiency avoided cost data until the data is approved by the PUC.

**Cascade Response:** Cascade would like clarification regarding whether this rule applies only to Energy Trust's budgeting process, or if it also includes the Conservation Potential Assessments (CPA) that the Company works with Energy Trust on, for inclusion in its IRPs. Since the CPA is usually the first time the Company introduces its new avoided cost calculation, Cascade would prefer to be able to use the new avoided cost figures for the CPA used in the IRP.